

TO:
Docket Management Facility
U.S. Department of Transportation
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Fax: 1-202-493-2251

FROM: The National Association of Publicly Funded Truck Driver Schools, Board of Directors

DATE: September 20, 2003

RE: DOT DMS Docket No: FMCSA-97-2199

Who we are

The National Association of Publicly Funded Truck Driving Schools (NAPFTDS) is an association of nonprofit, post-secondary, public schools whose purpose is to encourage member schools to promote high standards and ethical principles in the creation and/or administration of training programs. NAPFTDS is represented by over eighty member schools from seven regions throughout the United States. Trucking companies and allied industries are welcomed as associate members.

Our member schools take pride in their programs and their graduates. In a recent survey NAPFTDS revealed that:

- The average length of a truck driving program at member schools is eight weeks or 284 hours.
- Based on active member schools, there are nearly 17,000 graduates each year.

As an Association, we appreciate the opportunity the FMCSA has provided for written comments on the proposed rulemaking referenced above. The following commentary is the consensus of the Board of Directors, National Association of Publicly Funded Schools.

1. We believe that the training of entry-level drivers in the heavy truck industry is not adequate. Our belief is supported by the findings of a study mandated by the Intermodal Surface Transportation Efficiency Act of 1991. (FR Doc 03-20999, p.1)

We recognize the gravity of this inadequacy in training, and we are concerned about its continuing reverberations on the American public.

On the other hand, we would be remiss if we were not cognizant of a bright side: There are many exemplary driver training programs.

But, because there is no required standard, the fact remains: Many entry-level drivers are not adequately trained. Unfortunately, there are numerous abbreviated "CDL mills" that take the students' money and train them solely to pass the CDL tests. Thus, many drivers are not prepared to operate safely on our nation's highways.

2. We are aware that Congress has required action: The Secretary of Transportation was directed to promulgate regulations requiring training for entry-level CMV drivers. "Congress was specifically concerned about the number of heavy truck crashes caused by inadequate driver training, and believes that better training will reduce these types of crashes." (FR Doc 03-20999, p.19)

An outgrowth of this Congressional requirement is the proposal, Docket No. FMCSA-97-2199.

3. We believe that the proposal referenced above is deficient, falling far short of ensuring the safety of CMV operations on our nation's highways. We ask the FMCSA to re-examine it.

The agency proposes training in four areas: driver qualifications, hours of service, wellness, and whistle blower protection. The proposal doesn't specify a required number of hours; it only estimates 10.5 hours.

With its notice of proposed rulemaking, the FMCSA affirms that this proposal includes "standards for mandatory training requirements for entry-level operators of commercial motor vehicles." (FR Doc 03-20999, p.1)

Furthermore, the FMCSA recommends that the required training be part of the commercial driver licensing (CDL) program. In fact, the agency states that its proposal is "part of an overall FMCSA effort to improve the CDL program." (FR Doc 03-20999, p. 3)

4. We request that the FMCSA re-direct its efforts to focus on the improvement of training programs in our country, with minimum training requirements at the core of this work.

A clear mandate from Congress is already in place: Our representatives want regulations requiring improved training for entry-level drivers. They did not request the FMCSA to improve the CDL licensing program.

It is common knowledge within the industry that passing the CDL tests does not assure that the entry-level driver is properly trained.

Historically, the CDL program, created in 1986, was intended to establish national minimum testing and licensing standards for operators of CMVs. Its goal is to measure driver knowledge and skill. The CDL program was not intended to address the concept of standards for training requirements. This concept had been addressed separately and previously in the early 1980s, resulting in the development of a curriculum with standardized, minimum requirements, plus training materials and guidelines.

5. We recognize that a curriculum with standardized training requirements is available today. It has been developed, updated and made ready for public use. We believe that all entry-level truck drivers can benefit from this curriculum, since it contains a common core of subject matter relevant to the various types of vehicles used in the industry.

The curriculum includes:
Basic operation
Safe operating practices
Vehicle maintenance
Non-vehicle activities

We are grateful to the DOT/FMCSA for developing the curriculum. Using input from multiple sources, the agency accomplished an enormous task. It would be a shame not to use the curriculum concepts in the goal to improve training of entry-level drivers.

6. It is time to move forward and assure that all entry-level drivers participate in comprehensive, quality training programs before beginning their careers in trucking. The question of minimum, entry-level training has been debated for over two decades. We believe it is time to take action to prevent more needless deaths and injuries on our highways.

We feel that the vast majority of motor carrier safety directors and insurance representatives are genuinely concerned about hiring well-trained drivers. Accordingly, we know from experience, that most prospective students want to attend and graduate from a quality school.

7. We stand ready to help.

We feel that the professional staff in our publicly funded schools can offer constructive input. They represent post-secondary schools throughout our country and can draw on solid experience in truck driver education. They have worked diligently, some devoting entire careers to the training of entry-level drivers.

8. Our offer to help is prompted by our belief that each prospective CMV driver deserves a quality training program, with standard, minimum requirements. Likewise, the American public deserves to be assured that each CMV driver on the highway is a well-trained, safe driver.

Sincerely,

BOARD OF DIRECTORS, National Association of Publicly Funded Truck Driving Schools

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